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MEMORANDUM

TO: The Commission

FROM: Kathleen Guith
Deputy Associate General Counsel for Enforcement

BY: Susan L. Lebeaux *SLC by RQL*
Assistant General Counsel

Roy Q. Luckett *RQL*
Attorney

SUBJECT: MUR 6758 (Zerban for Congress)
Pre-Probable Cause Conciliation Agreement

On September 24, 2013, the Commission voted to enter into pre-probable cause conciliation with the Committee in connection with the Committee's violation of 2 U.S.C. § 434(b), which resulted from the Committee's failure to accurately disclose disbursements in its original 2012 12-Day Pre-General Report. Attached is a conciliation agreement signed by Stephen Hershkowitz, counsel for Rob Zerban for Congress and Randy Bryce in his official capacity as treasurer ("Committee" or "Respondent"), which would settle the Committee's violation. Attachment 1. We recommend the Commission accept the signed agreement.

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We therefore recommend that the Commission accept the attached conciliation agreement and close the file.

RECOMMENDATIONS:

1. Accept the attached conciliation agreement with Rob Zerban for Congress and Randy Bryce in his official capacity as treasurer.
2. Approve the appropriate letter.
3. Close the file.